

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems)	
)	
Wireless E911 Phase II Implementation)	
Plan of Nextel Partners, Inc.)	

**NEXTEL PARTNERS, INC.
PHASE I AND PHASE II E911 QUARTERLY REPORT
MAY 1, 2003**

**To: Chief, Enforcement Bureau
Chief, Wireless Telecommunications Bureau**

INTRODUCTION

Pursuant to the October 12, 2001 Order of the Federal Communications Commission ("Commission") in CC Docket No. 94-102,¹ Nextel Partners, Inc. ("Nextel Partners") respectfully submits this Enhanced 911 ("E911") Quarterly Report on its implementation of Phase I and Phase II E911. Nextel Partners achieved its first Phase II benchmark, October 1, 2002, when it began selling and activating an Assisted Global Positioning Satellite ("A-GPS") handset. Since that date Nextel Partners has begun selling a second A-GPS handset model and has launched 9 Public Safety Answering Point ("PSAP") areas with Phase II service that encompass 31 PSAPs. Herein, Nextel Partners provides an update on all relevant events impacting handset upgrades and network infrastructure necessary to enable Phase II E911 location capabilities as well as a

¹ *In the Matter of Revision of the Commission's Rules To Ensure Compatibility With Enhanced 911 Emergency Calling Systems, Wireless E911 Phase II Implementation Plan of Nextel Communications, Inc. and Nextel Partners, Inc.*, Order, CC Docket No. 94-102, FCC 01-295, released October 12, 2001 ("Nextel Waiver Order").

listing of all pending requests for Phase I and Phase II E911 service and the status of each request.

BACKGROUND

Pursuant to the Nextel Waiver Order, the Commission imposed on Nextel Partners the following Phase II E911 implementation plan:

- October 1, 2002:* Begin selling and activating A-GPS-capable handsets;
- December 31, 2002:* Ensure that at least 10% of all new handsets activated are A-GPS-capable;
- December 1, 2003:* Ensure that at least 50% of all new handsets activated are A-GPS-capable;
- December 1, 2004:* Ensure that 100% of all new digital handsets activated are A-GPS-capable;
- December 31, 2005:* 95% of all subscriber handsets in service are A-GPS-capable.²

As Nextel Partners has detailed in its previous Reports,³ Nextel Communications, Inc. (“Nextel Communications”), Nextel Partners and Motorola (Nextel Communications and Nextel Partners are collectively referred to herein as “Nextel”) began developing an A-GPS capability for Nextel’s integrated digital enhanced network (“iDEN”) technology in the Fourth Quarter of 2000, prior to the Commission granting Nextel’s waiver request. Launching a complicated technology to first calculate, and then deliver, location information from an iDEN handset to a PSAP, particularly in the compressed timeline demanded by the Nextel Waiver Order, required unprecedented efforts and coordination

² Nextel Waiver Order at ¶37.

³ See, e.g., *Nextel Partners, Inc. Phase I and Phase II E911 Quarterly Report*, CC Docket No. 94-102 (Nov. 1, 2002); *Nextel Partners, Inc. Phase II E911 Quarterly Report*, CC Docket 94-102 (Aug. 1, 2002); *Nextel Partners, Inc. Phase II E911 Quarterly Report*, CC Docket 94-102 (May 1, 2002).

among numerous entities. These extraordinary efforts and the multi-party coordination continue as Nextel Partners deploys individual PSAPs.

DISCUSSION

A. A-GPS Capable Handsets

Following the launch of its first A-GPS capable handset, the i88s, on October 1, 2002 in compliance with its first Phase II implementation benchmark, Nextel Partners launched its second A-GPS capable handset, the i58sr, on January 1, 2003. Nextel Partners continues to work with its sole handset vendor, Motorola, to develop additional A-GPS capable models, which are anticipated to be commercially launched later in 2003. Nextel Communications, via an independent third-party consultant, completed accuracy testing of its A-GPS handsets prior to its October 1, 2002 benchmark date and met the Commission's accuracy standards. Per Nextel's Waiver Order, the next deployment benchmark period on which Nextel Partners must report ends on November 30, 2003. Nextel Partners will report on that benchmark in its February 2004 Quarterly Report.⁴

B. Network Infrastructure

Nextel Partners continues to commit significant resources and personnel to deploy PSAPs as rapidly as possible and has made noteworthy progress since its February Report, including testing and deploying a second Phase II deployment methodology using Emergency Services Routing Digits ("ESRD"). Moreover, because of complexities inherent in deployments and despite rigorous network and component testing by Nextel

⁴ Nextel's Waiver Order states that "Nextel must report, in the Quarterly Report immediately following the benchmark date...for the periods of December 31, 2002 to November 30, 2003..., the percentage of new handsets activated nationwide during the respective periods that were A-GPS capable, as well as the total number of new handsets during those periods that were A-GPS capable." Nextel Waiver Order at ¶ 32.

and Motorola prior to its October 1, 2002 Phase II launch, Nextel continues to discover end-to-end connectivity issues in some cases.

As Nextel Partners noted in its February Report, some PSAPs require a Phase II solution using ESRD rather than emergency services routing key (“ESRK”), which is the solution Nextel supported when it launched its Phase II technology.⁵ In an attempt to satisfy these requests, Nextel began analyzing an ESRD solution for its iDEN network and remained in contact and committed to working with PSAPs from those areas requiring the ESRD solution.⁶ Adjusting Nextel’s interconnectivity to support the use of ESRD was anticipated to create possible integration issues involving Nextel, the local exchange carrier (“LEC”), and Nextel’s third party vendor, Intrado.

After conducting extensive testing on its own network over the last few months, Nextel Communications commenced testing its ESRD solution in a live market, referred to as a First Office Application (“FOA”), on March 10, 2003 in Spartanburg, South Carolina. Certain system integration issues and technical interconnectivity problems were not detected until the FOA, which resulted in the PSAP having to manually rebid twice to receive Phase II information. At Nextel Communication’s request, Intrado and the LEC (BellSouth) investigated this issue for over a week and determined that timers in the LEC network caused certain Phase I information not to be available to the PSAP at initial call setup. Specifically, the need for two manual rebids resulted from interactions

⁵ Either ESRK or ESRD is a technologically acceptable signaling solution to allow the PSAP to obtain E911 Phase II information from the wireless carrier’s network. ESRK may also be referenced as non-call path associated signaling (“NCAS”) or wire line compatibility mode and ESRD may be referenced as hybrid call path associated signaling (“HCAS”).

⁶ As Nextel Partners explained in previous Quarterly Reports, some PSAPs have requested that Nextel Partners transmit the textual street address (i.e. 123 Main Street) of the cell site rather than (or in addition to) the latitude and longitude of the cell site. Nextel Partners’ ESRD solution provides PSAPs that textual information.

between timer settings in the LEC network as well as data availability in Nextel Communications' Gateway Mobile Location Center ("GMLC") and the Intrado automatic location information ("ALI") network. It was also determined that these network timer settings could not be changed immediately without impacting other wireless carriers, landline customers and PSAP operations. The PSAP accepted this ESRD Phase II solution, although it requires two manual rebids, and Nextel Communications exited its FOA on March 28, 2003. Nextel continues to work with its vendors to fine-tune its ESRD solution and anticipates, absent unexpected technological problems or delays, to deliver enhancements in the near term.

Following the Spartanburg effort, and utilizing the data and experience gleaned from that effort, Nextel Partners commenced a successful FOA with Qwest in Ada County, Idaho, utilizing the NCAS solution. This was the first time that Nextel had tested its NCAS solution with Qwest. The efficient deployment resulted from the cooperative efforts of all parties including Ada County, Qwest, Nextel Partners, Nextel Communications and Intrado. Likewise, Nextel Partners has experienced cooperation and good faith efforts in other deployments with many parties who are committed to deploying E911 as rapidly as possible.

In fewer than 4 weeks after Nextel exited its' ESRD FOA in Spartanburg, SC, Nextel Partners has deployed its ESRD Phase II solution in 2 areas served by BellSouth including Lafayette, LA and Mobile, AL. Furthermore, Nextel Partners is scheduled to commence deployment of its ESRD Phase II solution with Escambia, FL and Hawkins, TN in mid-May. Simultaneously, Nextel Partners has continued to work with and

aggressively deploy its ESRK Phase II solution to numerous other PSAPs throughout the country.

As Nextel Partners has noted in its previous reports, the complexities of deployment may create unexpected, temporary delays even after a particular technology has been deployed successfully many times. For example, when Nextel Partners commenced deployment of its ESRK Phase II solution with Cattaraugus County, NY, the parties discovered unexpected customer premises equipment (“CPE”) timer issues. Although delay occurred while additional testing was conducted to identify and isolate the problem, the issue was resolved with the cooperation of all parties and the PSAP was deployed successfully.

Nextel Partners remains committed to working cooperatively with PSAPs throughout the country and to deploying E911 as efficiently as possible. Nextel Partners will continue to dedicate significant resources to maintain its aggressive roll out schedule of its Phase I ESRD and Phase II ESRK and ESRD solutions.

C. Phase I Requests

With respect to the Commission’s requirement that Nextel Partners provide “information on all Phase I and Phase II requests,”⁷ Nextel Partners has attached Exhibit A listing all of its 91 pending Phase I requests and their current status.⁸ For all on-going Phase I deployment efforts, Exhibit A provides a list of every pending Phase I request, the name of the PSAP, the date of the request, whether or not the request is valid,⁹ its

⁷ See Nextel Waiver Order at ¶32.

⁸ In many cases a PSAP area listed in Exhibit A and Exhibit B represents multiple local PSAPs.

⁹ Per Nextel’s Waiver Order, Nextel Partners is required to report whether it believes each deployment request is (or is not) valid. See Nextel Waiver Order at ¶32. On March 24, 2003 Nextel filed a letter in WT Docket No. 03-76 stating that Nextel has been and continues to be in contact with PSAPs that have

status, an explanation of the delay if the request is older than six months,¹⁰ and an anticipated Phase I launch date. The proposed deployment dates in Exhibit A are target launch dates, which Nextel Partners and the relevant PSAP are striving to meet. Nextel Partners is in regular contact with each of these PSAPs and is working to deploy Phase I E911 as soon as possible. **Nextel Partners has fully deployed Phase I E911 service with 405 PSAPs, which are listed on Exhibit A.**

With regard to Exhibit A, Nextel reiterates herein that Phase I E911 deployments, similar to Phase II deployments, continue to be complicated by a number of factors – many of which are outside of Nextel Partners’ control. To better clarify the status of each request, we have included two additional categories for those requests previously stated as “On-Hold”. A total of 46 requests will require “No Action” because the request is in an area where Nextel Partners does not offer coverage. There are no cell sites to route calls to the requesting PSAP. These requests were previously placed “On-Hold”. Nextel Partners will notify the requesting PSAP of its’ current status and any future changes that may occur. In addition, 29 requests are considered “Invalid” because the requesting PSAP or servicing LEC, do not have equipment and or software in place to support our implementation. Even if we consider a 6-month lead-time, the PSAP has verified the facility would not be ready. These requests were previously placed “On-Hold”. Nextel Partners will notify each of these requesting PSAPs and request a future submittal for

requested Phase I or Phase II service and will deploy these PSAPs as soon as possible pursuant to a mutually agreeable implementation schedule. Thus, Nextel Partners is complying herein with the Commission’s requirement that it mark as “valid” or “invalid” each PSAP request, although as a practical matter, Nextel Partners’ deployment team is working with each and every PSAP listed in Exhibits A and C to deploy them as soon as possible pursuant to a mutually agreed-upon time frame.

¹⁰ In some cases there are delays caused by technology issues. Such delays do not necessarily mean that the PSAP or Nextel Partners is not “ready” for Phase I service. Rather, it often means there are issues

implementation of the Phase I service. The 3 requests in the “On-Hold” category now consists of requests where one party (Nextel Partners or the PSAP) is ready to deploy and the other party is working through technical issues, with an end date close at hand. The change in status has allowed Nextel Partners to better focus on outstanding issues that can be resolved quickly and implement Phase I service within the 6-month period required.

D. Phase II Requests

Exhibit B addresses Nextel Partners’ ongoing Phase II deployment efforts, providing a list of every Phase II request, the name of the PSAP, the date of the request, whether or not the request is valid,¹¹ its status, an explanation of the delay if it is “on hold,” and an anticipated Phase II launch date.¹² Nextel Partners has received Phase II service requests in 152 PSAP areas and has asked that each of these PSAPs provide the documentation required in the *Richardson Order* for determining the request’s validity.¹³

As in Exhibit A, the proposed deployment dates in Exhibit B are target launch dates, which Nextel Partners and the relevant PSAP are striving to meet. Nextel Partners reiterates that accomplishing such deployments is subject to numerous factors and parties outside of Nextel Partners’ control; thus, Nextel Partners’ deployment schedule establishes a goal toward which Nextel Partners will work. It is likely, however, that complexities will be encountered that will delay some PSAP deployments. Nextel

involving incompatible technologies between Nextel Partners, the LEC and/or the PSAP. *See also* note 8 herein.

¹¹ *See* note 9 herein.

¹² *Id.*

¹³ *See generally, In the Matter of Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson*, Order On Reconsideration, CC Docket No. 94-102, FCC 01-293, released November 26, 2002. *See also*, Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, *Order on Reconsideration*, rel. Nov. 26, 2002.

Partners is in regular contact with each of these PSAPs and is working to deploy Phase II E911 as soon as possible within mutually agreed upon time frames.

LEC “holds” in some areas have prevented Phase II deployments. For example, in the territories served by SBC, the LEC advised Nextel Partners that deployments cannot commence until tariffs or contracts with PSAPs have been approved. In those service territories where tariff issues have been resolved, Nextel Partners is in the process of scheduling all PSAPs that are ready to deploy Phase II. Nextel Partners, moreover, is prepared to begin deployments in those SBC regions still awaiting final tariffs/contracts, and will deploy Phase II service as rapidly as possible within mutually agreeable time frames when these issues have been resolved. However, because Nextel Partners’ human capital is a finite resource and, in light of the technical complexities often involved with deployments, Nextel Partners cannot possibly deploy all SBC area PSAPs simultaneously. Rather, once the tariff issues are resolved, Nextel Partners will work with each PSAP to arrange a mutually agreeable deployment schedule and deploy service as quickly as possible.

Since October 1, 2002, its first implementation benchmark, Nextel Partners has deployed Phase II service in 9 PSAP states, which are listed in Exhibit B, encompassing 31 PSAPs. Nextel Partners has deployed Phase II service in The State of Alabama, Illinois, Indiana, Idaho, Louisiana, New York, Pennsylvania, Vermont and Virginia. Nextel Partners remains actively engaged with other PSAPs at multiple locations and anticipates deploying Phase II service in the State of Arkansas, Florida, Kentucky, Minnesota, Mississippi, Tennessee, and Texas in the near future, consistent with mutually agreeable timeframes.

CONCLUSION

As required in the Nextel Waiver Order,¹⁴ Nextel Partners is providing this Quarterly Report to the Executive Directors and counsel of the Association of Public Safety Communications Officials-International, Inc. (“APCO”), the National Emergency Number Association (“NENA”) and the National Association of State Nine One One Administrators (“NASNA”). Should any of these organizations or their individual PSAP members have questions or concerns about Nextel Partners’ submission, Nextel Partners encourages them to contact Pete Gaffney, at the number listed below, as soon as possible to facilitate rapid and efficient deployment of Nextel’s Phase I and Phase II E911 services.

Respectfully submitted,
Nextel Partners, Inc.

/s/ David Aas
By: _____

David Aas
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May 1, 2003

¹⁴ Nextel Waiver Order at ¶32.

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STATE OF	Washington)	
)	ss.
COUNTY OF	King)	

AFFIDAVIT

David Aas, duly sworn, deposes and states that:

1. I am the Vice President of Nextel Partners, Inc., with an address of 4500 Carillon Point, Kirkland, Washington 98033, and with a telephone number of (425) 576-3600.
2. I hereby represent that the attached data regarding the status of Nextel Partners' E-911 Phase one and two deployments are true and correct to the best of my knowledge, information and belief.

/s/ David Aas

David Aas

In witness whereof I have hereunto subscribed my name and affixed my official seal this 1st day of May, 2003.

/s/ Claire Timmons

Printed Name: Claire Timmons
NOTARY PUBLIC in and for the State of Washington
My Commission Expires : March 31, 2005



CERTIFICATE OF SERVICE

I, Brent Eilefson, hereby certify that on this 1st day of May, 2003, caused a copy of the attached Phase II E911 Quarterly Report of Nextel Partners, Inc. to be served by US Mail to the following:

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/s/ Brent G. Eilefson

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